

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED - GR
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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY:JMW SCANNED BY: JW 12-14

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JENNIFER ROBERTSON and
MICHELLE McALLISTER,

Defendants.

_____ /

The United States Attorney charges:

Conspiracy to Possess, Transport, and Traffic in Stolen Medical Products

From on or about August 25, 2017 through on or about November 18, 2019, in Calhoun and Hillsdale Counties, in the Southern Division of the Western District of Michigan, and elsewhere,

JENNIFER ROBERTSON
and
MICHELLE McALLISTER,

in or using any means or facility of interstate or foreign commerce, conspired with each other, Steven William Anderson, Jr., and others known and unknown, to knowingly possess, transport, and traffic in pre-retail medical products with a value greater than \$5,000 that were involved in violations of 18 U.S.C. §§ 670(a)(1) and 670(a)(3), namely, diabetic test strips that ROBERTSON stole from the Battle Creek VA Medical Center in Calhoun County, Michigan, and which ROBERTSON, McALLISTER, and Anderson then knowingly possessed, transported, and trafficked.

1:22-cr-172

Hala Y. Jarbou
Chief U.S. District Judge

FELONY INFORMATION

OBJECT, MEANS, AND METHODS

1. The object of the conspiracy was for Anderson, McALLISTER, and ROBERTSON to unlawfully enrich themselves by stealing and distributing diabetic test strips.

2. The participants in the conspiracy accomplished this object by stealing diabetic test strips, and by knowingly buying, selling, possessing, transporting, and trafficking diabetic test strips that had been stolen.

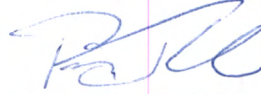
3. ROBERTSON stole diabetic test strips from her place of employment, which was the Battle Creek VA Medical Center in Calhoun County, Michigan.

4. ROBERTSON and McALLISTER used electronic messages to arrange in-person hand-to-hand transactions, in which McALLISTER paid ROBERTSON cash in exchange for stolen diabetic test strips.

5. Meanwhile, Anderson communicated with McALLISTER for the purpose of discussing and arranging further transactions in the same stolen diabetic test strips. Pursuant to those communications, after McALLISTER obtained stolen diabetic test strips from ROBERTSON, she shipped them to Anderson in Pennsylvania, in exchange for electronic and wire payments.

18 U.S.C. §§ 670(a)(1, 3, 6), (b)(1), (c)(2), (e)(1-3, 6)
21 U.S.C. § 321(h)(1)
21 C.F.R. § 862.1345

MARK A. TOTTEN
United States Attorney

A handwritten signature in blue ink, appearing to read 'P. Castle', is written over a horizontal line.

Date: December 13, 2022

PATRICK J. CASTLE
Assistant United States Attorney